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Sent: Tuesday, July 25, 2023 12:14 PM
To: Allison MacEwen <AMacEwen@irac.pe.ca>
Subject: Letter of opposition to a gas retail outlet application submitted by D.P. Murphy

To whom it may concern:

Please acknowledge receipt of this letter and ensure it is posted promptly.

In his letter dated June 26, 2023 Mark Doucet, general counsel for D.P. Murphy, states that the facts of the application "demonstrate clearly that the test of public interest, convenience and necessity are satisfied."

I submit that the facts of the application completely lack any conclusive evidence that the test of public interest, convenience or necessity are demonstrated in the application and it would be appropriate for IRAC to reach this same conclusion.

The large number of letters submitted by the public, as well as the representation from the MP and MLA for the area, opposing this application is surely evidence that the public interest would not be served by approving this application.

D.P. Murphy presents two letters in support of the application - one from Strait Crossing, a company whose parent company is Vina Concessions. These off-island corporations are motivated solely by shareholder returns and not by what is in the best interest of the public. Further to that, they provide no evidence in the letter of support to conclude that a new gas station would provide the "best service and convenience". The services currently provided have been noted in a number of letters submitted already so I will not repeat them. Suffice it to say, there are no services mentioned in the application that are not already available in the community.

The one other letter of support is provided by TIAPEI. TIAPEI provides no evidence that a new gas station will support tourism. I would argue that a generic "big stop" is not what tourists are looking for on PEI. One of the things visitors consistently comment on is how friendly Islanders are. A welcome is exactly what they get when greeted by a 3rd generation family member at Ceretti's or Howatt's. Tourists get assistance from people from the community who know the area and can provide information about accommodations, grocery shopping, provide directions and suggest hidden island treasures. A look at D.P. Murphy franchises, like Wendy's and Tim Horton's, reveals a workforce of recent immigrants who can not have a deep knowledge of the Borden area and can not give a tourist an authentic experience. Not only will community members lose their employment but they may lose their housing if D.P. Murphy seeks to displace long term tenants in the area to house new immigrants: as it tried to do in Souris. A new gas station in Borden will not, as TIAPEI states,

"create a sense of arrival" but will detract from the friendly welcome that is so valued as part of our visitors' experience.

No letter of support was provided by Irving, which is odd, as it is a major stakeholder in this venture.

There is not a shred of evidence in the application that a new gas station is in the public interest, nor that it is necessary or convenient.

Borden area can out support 4 gas stations. The oil companies require that a certain volume of gas be sold each year or else they can choose not to renew the contract. (This is what happen to Clow's in Hampshire). Ceretti's and Howatt's struggle in some years to ensure those volumes are reached and perhaps this is the reason Irving has not renewed its contract with Ceretti's.

The loss of Ceretti's and Howatt's would result in less competition and reduced services. Ceretti's was a country store that added the gas station - one can purchase meat, produce, plumbing, hardware supplies and other items folks need. The new gas station would not have a meat counter nor locally produced food and would not support the local food system like a country store does. The loss of Ceretti's and Howatt's would decrease the number and diversity of services provided to both tourists and Islanders in the area.

During Covid and Fiona it was not the big corporation (or government for that matter) that stepped up to look after people in rural communities, it was small local businesses who supported the people in their community. A "big stop" in Borden, where the owners are not part of the community, would mean the community will become less resilient in extreme weather conditions and other emergency situations - there would be no grocery store, no possibility of providing cold storage for food that would otherwise go to waste in a long power failure, no credit, no food delivery and all the other services Ceretti's and Howatt's happily provide to their friends and neighbours.

Canada and PEI's climate change adaptation strategy includes a transition to EV vehicles. The trend in gasoline sales will be a reduction in demand as Canadians are incentivized to get off fossil fuels. Now is not the time to add a gas station, especially where visitors and Islanders are already well served by the three gas stations in the area. It is also foolhardy to add the additional environmental risk that a gas station entails without a compelling reason to do so.

The application fails to demonstrate the correlation between gas sales and bridge traffic. Until this is known, with some certainty, one cannot conclude that increased bridge traffic or increased tourism to PEI necessitates a new gas station. No one will argue that the Confederation Bridge, and therefore Borden, is an important entry point. However, the applicant has not presented evidence that increased bridge traffic means additional services are necessary. How many people stop in Borden to "gas up" before they leave the island. How many people wait to get gas after they cross the bridge from NB? I also don't see long haul truckers, neither those heading for home at the end of their journey or those heading off island at the start of their journey, using the services of a "big stop" in Borden to any great extent. Increased tourism resulting in increased bridge traffic is a meaningless argument for a new gas station without collaborating evidence of the correlation between the two.

The three gas stations in the area are sufficient to meet the needs of the motoring public, the population size and trends do not justify the approval of a 4th gas station.

The application mentions that Irving is the largest refinery in Canada. With rumours that Irving may be selling their refinery, this is likely not a good argument to make if attempting to show Irving is a "good corporate citizen". The fact that they would cease their relationship with Ceretti's to accommodate D.P. Murphy should tell us all we need to know about their concern for islanders and their "community focus".

D.P. Murphy has acknowledged that a new gas station will likely mean less competition as neither Ceretti's nor Howatt's is likely to remain viable if this application is approved. The number of letters supporting these locally owned businesses provide ample evidence of the diverse and informal services that will not be provided by a big corporation whose main concern is providing a return on investment to shareholders and hoarding more money for already wealthy individuals and who have demonstrated how little regard they have for the people in the communities they operate in.

This application fails to meet the criteria that IRAC must measure it against.

It would be a travesty if this application is approved.

Regards,
Pauline Howard